



EPSTEIN DRANGEL LLP

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October 3, 2022

VIA ECF

Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED**

New Ben
VERNON S. BRODERICK
U.S.D.J. 10/04/2022

Re: *Marcelo Burlon S.r.l. v. Adidasstore, et al.*

Civil Case No. 19-cv-11333 (VSB)

Marcelo Burlon S.r.l. v. ailei fashion, et al.

Civil Case No. 19-cv-11336 (VSB)

Request for Extension of Time to File Supplemental Submissions

Dear Judge Broderick,

We represent Plaintiff Marcelo Burlon S.r.l. (“Plaintiff”), in the above-referenced related matters (the “Actions”).¹ On September 23, 2022, the Court directed Plaintiff to file supplemental declarations by no later than October 7, 2022 (“Supplemental Declarations”). For the reasons set forth herein, Plaintiff respectfully requests a two-week extension to file the Supplemental Declarations, until October 21, 2022.

In accordance with Your Honor’s Individual Practices, Plaintiff respectfully submits the following:

1. **Original date:** October 7, 2022;
2. **Number of previous requests for extension of time:** None, this is Plaintiff’s first request for an extension of time to file its Supplemental Declarations;
3. **Whether these previous requests were granted or denied:** N/A;
4. **Whether the adversary consents:** None of the Defendants have appeared in these Actions and thus Plaintiff did not seek their consent; and
5. **The specific reasons for an extension of time:** The reason for Plaintiff’s request for an extension of time is that Epstein Drangel needs additional time to correspond with its Beijing office regarding its investigation of Defendants’ addresses however, Epstein Drangel’s Beijing office is currently closed this week (October 3 through October 7) due to a Chinese National Holiday.

¹ Where a defined term is referenced herein but not defined, it should be understood as it is defined in the Glossary in Plaintiff’s Complaints or Applications.

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We thank the Court for its time and attention to this matter.

Respectfully submitted,

EPSTEIN DRANGEL LLP

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